

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PIONEER HI-BRED INTERNATIONAL, INC.,)
)
)
Plaintiff,)
)
)
v.) C.A. No. 22-1280-RGA
)
)
SYNGENTA SEEDS, LLC,)
)
)
Defendant.)
)
)

STIPULATION AND [PROPOSED] ORDER TO EXTEND CERTAIN DEADLINES

WHEREAS, Defendant Syngenta Seeds, LLC requests a two-week extension for its reply expert report, presently due August 7, 2024;

WHEREAS, Defendant likewise requests an extension of the expert discovery cut-off deadline, presently set for August 21, 2024;

WHEREAS counsel for both sides represent that their respective clients have received a copy of this request;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties, subject to the approval of the Court, that the following deadlines are amended as set forth below:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Reply Expert Reports	August 7, 2024 (D.I 158)	August 21, 2024
Expert Discovery Cut-Off	August 21, 2024 (D.I 143)	September 13, 2024
Case Dispositive Motions (Opening Briefs)	September 18, 2024 (D.I. 143)	October 16, 2024
Answering Case Dispositive Briefs	October 16, 2024 (D.I. 143)	November 22, 2024
Reply Case Dispositive Briefs	November 6, 2024 (D.I. 143)	December 20, 2024
Deadline to File Joint Proposed Final Pretrial Order	4th business day before the Pretrial Conference (D.I. 143)	NO CHANGE

Deadline to File Proposed Voir Dire, Preliminary Jury Instructions, and Final Jury Instructions	4th business day before the Pretrial Conference (D.I. 143)	NO CHANGE
Pretrial Conference	February 7, 2025, at 9:00 a.m. (D.I. 143)	March 31, 2025, at 9:00 a.m., subject to the Court's availability
Trial	February 24, 2025, at 9:30 a.m. (D.I. 143)	April 21, 2025, at 9:30 a.m., subject to the Court's availability

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IT IS SO ORDERED, this _____ day of _____, 2024.

The Honorable Richard G. Andrews
United States District Judge